



October 29, 2012

ORIGINAL

BY OVERNIGHT MAIL

Mr. Kenneth I. Rose, III
Financial Analyst (3HS62)
U. S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Re: Required Submission of Information
Metro Container Site, Trainer, Pennsylvania

Dear Sir:

This letter will serve as the response of Zenith Products Company ("Zenith"), 400 Lukens Drive, New Castle, Delaware to the October 9, 2012 letter of Joanne Marinelli regarding the above-referenced site.

INTRODUCTION

As stated in Zenith's April 19, 2012 submission to EPA (see attachment) regarding the initial 2012 request for information regarding Zenith Products and our involvement in the Metro Container Site in Trainer, Pennsylvania, Zenith would again note that it does not have the same ownership or management as the entity which sent what Zenith understands to be empty drums to the Metro Container facility for reconditioning or destruction during a period in the middle 1980s. The entity involved in that action was either a C Corporation owned by Joyce E. Roggio, A. James Aruffo and several small minority owners or a Subchapter S Corporation owned by eight employees. That entity was then transferred to Zenith Acquisition Corp., a corporation owned by Masco Corporation ("Masco"), a publicly held corporation, on or about February 28, 1994. Thereafter, Zenith Products was operated as a wholly-owned subsidiary of Masco until late in 2005 when the present majority owner and several minority owners of Zenith Products Corp. purchased the stock in the wholly-owned subsidiary from Masco.

The present Zenith has between seven and ten employees who may have worked at the former Zenith's Aston location at the time when drums were sent by the former Zenith entity to the Metro Container Trainer location. Those individuals do not have personal knowledge of the drums, their contents, the 1980s' manufacturing processes, procedures related to the cleaning and handling of the drums, or the production at the Aston facility in the 1980s which may have required raw materials in drums during the manufacturing process or produced any waste materials which were placed in drums. In addition, the Aston facility was sold to Zenith Acquisition in February of 1994.

There was an earlier Section 104(e) request to the former Zenith entity at the Aston facility in 1988 as well as the March 9, 2012 request. A copy of the responses to both

requests is attached hereto. To date, despite several searches under the author's direction, Zenith has not located or obtained any further knowledge or records regarding additional communications regarding the Metro Container site or the materials sent to the site, except for the materials submitted in both the 1988 submission and the most recent April 19, 2012 submission. As stated in the 4/19/2012 submission, the person who signed the original response, Briggs Pletcher, left Zenith in approximately January of 1999. He has no current relationship with Zenith and does not receive retirement or other continuing payments or benefits from Zenith. The only officer who has been employed at each of the Zenith entities since 1986 is Thomas Della Franco. He has only served in financial jobs and is presently the Chief Financial Officer. Since 1986, Zenith Products Company has gone through three separate ownership and management changes and has done a complete relocation of all of its physical operations from Aston, Pennsylvania to New Castle, Delaware. In fact, our current product line and production processes are completely different than the operations back in the early to mid 1980's.

RESPONSES

Zenith's responses to the specific inquiries in the October 9, 2012 letter are as set forth below. Zenith's Introduction is incorporated into each response.

1. Describe the activities/processes conducted at the Zenith facility which used paint formerly contained in drums/barrels that were or may have been sent to the Metro Container Site.

RESPONSE: The present employees of Zenith have no personal knowledge and currently we have no records of the activities/processes conducted at the Zenith facility which used paint that was formerly contained in drums/barrels that may or may not have been sent to the Metro Container Site.

2. Identify the chemical constituents of the paint used at the Zenith facility which was formerly contained in drums/barrels that were or may have been sent to the Metro Container Site.

RESPONSE: The present employees of Zenith have no personal knowledge and currently we have no records of the chemical constituents of the paint used at the Zenith facility which was formerly contained in drums/barrels that were or may have been sent to the Metro Container Site.

3. Provide a copy of all documents which refer or relate to the chemical constituents of the paint used at the Zenith facility which was formerly contained in drums/barrels that were or may have been sent to the Metro Container Site.

RESPONSE: Zenith has no records and no individuals with personal knowledge of this subject.

4. Describe the activity/process conducted at the Zenith facility which used oil formerly contained in drums/barrels that were or may have been sent to the Metro Container Site.

RESPONSE: The present employees of Zenith have no personal knowledge and currently we have no records of the activity/process which used oil formerly contained in drums/barrels that were or may have been sent to the Metro Container Site.

5. Identify the chemical constituents of the oil used at the Zenith facility formerly contained in drums/barrels that were or may have been sent to the Metro Container Site.

RESPONSE: The present employees of Zenith have no personal knowledge and currently we have no records of the chemical constituents of the oil used at the Zenith facility which was formerly contained in drums/barrels that were or may have been sent to the Metro Container Site.

6. Provide a copy of all documents which refer or relate to the chemical constituents of the oil used at the Zenith facility which was formerly contained in drums/barrels that were or may have been sent to the Metro Container Site.

RESPONSE: Zenith has no records and no individuals with personal knowledge of this subject.

7. Describe the activity/process conducted at the Zenith facility which used electroplating chemicals formerly contained in drums/barrels that were or may have been sent to the Metro Container Site.

RESPONSE: The present employees of Zenith have no personal knowledge and currently we have no records of the activity/process which used electroplating chemicals formerly contained in drums/barrels that were or may have been sent to the Metro Container Site.

8. Identify the chemical constituents of the electroplating chemicals used at the Zenith facility formerly contained in drums/barrels that were or may have been sent to the Metro Container Site.

RESPONSE: The present employees of Zenith have no personal knowledge and currently we have no records of the chemical constituents of the electroplating chemicals used at the Zenith facility which was formerly contained in drums/barrels that were or may have been sent to the Metro Container Site.

9. Provide a copy of all documents which refer or relate to the chemical constituents of the electroplating chemicals used at the Zenith facility which

was formerly contained in drums/barrels that were or may have been sent to the Metro Container Site.

RESPONSE: Zenith has no records and no individuals with personal knowledge of this subject.

10. Describe the activity/process conducted at the Zenith facility which used solvents formerly contained in drums/barrels that were or may have been sent to the Metro Container Site.

RESPONSE: The present employees of Zenith have no personal knowledge and currently we have no records of the activity/process which used solvents formerly contained in drums/barrels that were or may have been sent to the Metro Container Site.

11. Identify the chemical constituents of the solvents used at the Zenith facility formerly contained in drums/barrels that were or may have been sent to the Metro Container Site.

RESPONSE: The present employees of Zenith have no personal knowledge and currently we have no records of the chemical constituents of the solvents used at the Zenith facility which was formerly contained in drums/barrels that were or may have been sent to the Metro Container Site.

12. Provide a copy of all documents which refer or relate to the chemical constituents of the solvents used at the Zenith facility which was formerly contained in drums/barrels that were or may have been sent to the Metro Container Site.

RESPONSE: Zenith has no records and no individuals with personal knowledge of this subject.

Please contact the undersigned if you have any questions or require further information, to the extent such information may be available.

Sincerely yours,



Terry Douglas
President, Zenith Products

Attachments

1. Response to the April 19, 2012 Section 104(e) request
2. Response to the April 20, 1988 Section 104(e) request